

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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CUTBERTO VIRAMONTES, et al.	:	
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Plaintiffs,	:	
	:	Case No. 1:21-cv-04595
v.	:	
	:	Chief Judge Rebecca R. Pallmeyer
THE COUNTY OF COOK, et al.	:	
	:	
Defendants.	:	

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**PLAINTIFF’S RULE 56.1 STATEMENT OF ADDITIONAL MATERIAL FACTS**

Pursuant to Local Rule 56.1(b)(3), Plaintiffs Cutberto Viramontes, Christopher Khaya, Firearms Policy Coalition, Inc., and Second Amendment Foundation submit the following additional material facts in support of their opposition to the Defendants’ motion for summary judgment.

1. Plaintiff Firearms Policy Coalition, Inc. is a nonprofit organization incorporated under the laws of Delaware, with its principal place of business in Clark County, Nevada. *See* Decl. of Brandon Combs ¶ 3 (April 21, 2023), attached as Exhibit 1.

2. FPC seeks to defend and promote the People’s rights—including the right to keep and bear arms—advance individual liberty, and restore freedom. FPC serves its members and the public through legislative advocacy, grassroots advocacy, litigation and legal efforts, research, education, outreach, and other programs. *Id.*

3. FPC has members throughout the United States, some of whom reside in Cook County. *Id.* ¶ 4.

4. Plaintiffs Viramontes and Khaya are members of FPC. *Id.* ¶ 5.

5. This case is germane to the core purposes of FPC. *Id.* ¶¶ 6–7.

6. Plaintiff Second Amendment Foundation is a nonprofit educational foundation incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. *See* Decl. of Alan Gottlieb ¶ 3 (April 21, 2023), attached as Exhibit 2.

7. SAF seeks to preserve the effectiveness of the Second Amendment through education, research, publishing, and legal action programs focused on the constitutional right to keep and bear arms and the consequences of gun control. *Id.*

8. SAF has members throughout the United States, some of whom reside in Cook County. *Id.* ¶ 4.

9. Plaintiffs Viramontes and Khaya are members of SAF. *Id.* ¶ 5.

10. This case is germane to the core purposes of SAF. *Id.* ¶¶ 6–7.

Dated: April 24, 2023

David G. Sigale (Atty. ID# 6238103)  
LAW FIRM OF DAVID G. SIGALE, P.C.  
430 West Roosevelt Road  
Wheaton, IL 60187  
(630) 452-4547  
dsigale@sigalelaw.com

Respectfully Submitted,

/s/ David H. Thompson  
David H. Thompson\*  
Peter A. Patterson\*  
William V. Bergstrom\*  
COOPER & KIRK, PLLC  
1523 New Hampshire Ave., N.W.  
Washington, D.C. 20036  
(202) 220-9600  
(202) 220-9601 (fax)  
dthompson@cooperkirk.com  
ppatterson@cooperkirk.com  
wbergstrom@cooperkirk.com  
\*Admitted *pro hac vice*

*Attorneys for Plaintiffs*